

The Honorable William J. Clinton

March 9, 1998

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level of reductions uniformly to all of the affected states. Moreover, the very short comment period on the proposed SIP call effectively precludes states from completing their subregional analyses, thus deviating from EPA's previous willingness to accept and consider the results of these analyses.

We are committed to developing a proposal by August 1, 1998, that will result in the most efficient reduction of ozone in each of our states to solve our own problems and to address our share, if any, of the ozone problem in states that are downwind of us.

We believe our proposal will be more consistent with your implementation policy issued with promulgation of the new ozone standard in July, 1997. Our proposal will provide significant ozone reduction benefits. It will allow for an integrated approach to attaining the applicable ozone standards. It will provide reasonable time for our utilities and industries to plan for the improvements they will be required to make at their facilities, including proper consideration of other applicable requirements and standards.

We are providing a copy of this letter to Administrator Browner with the request that it be considered an alternative to EPA's proposal of November 7, 1997. We wish to work further with EPA towards developing the details to implement our suggested approach.

Frank O'Bannon

Sincerely,

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